December 2, 2004

Mr. M. R. Blevins, Senior Vice President
and Principal Nuclear Officer
TXU Power
ATTN: Regulatory Affairs
P.O. Box 1002
Glen Rose, Texas 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2 - RESPONSE TO NUCLEAR REGULATORY COMMISSION BULLETIN 2003-02, "LEAKAGE FROM REACTOR PRESSURE VESSEL LOWER HEAD PENETRATIONS AND REACTOR COOLANT PRESSURE BOUNDARY INTEGRITY" (TAC NOS. MC0530 AND MC0531)

Dear Mr. Blevins:

On August 21, 2003, the U.S. Nuclear Regulatory Commission (NRC) issued NRC Bulletin 2003-02, "Leakage from Reactor Pressure Vessel Lower Head Penetrations and Reactor Coolant Pressure Boundary Integrity," to the industry. This bulletin informed addressees that current methods of inspecting the reactor pressure vessel (RPV) lower heads may need to be supplemented with bare-metal visual inspections in order to detect reactor coolant pressure boundary leakage. The bulletin also requested these addressees to provide the NRC with information related to inspections that have been performed to verify the integrity of the RPV lower head penetrations.

The bulletin requested that addressees provide a description of the RPV lower head penetration inspection program that would be implemented at their respective plants during the next and subsequent refueling outages. This description was to include the extent of the inspection, the inspection methods to be used, the qualification standards for the inspection methods, the process used to resolve the source of findings of boric acid deposits or corrosion, the inspection documentation to be generated, and the basis for concluding that their plant satisfied applicable regulatory requirements related to the structural and leakage integrity of the RPV lower head penetrations.

By letter dated September 19, 2003, TXU Generation Company LP (TXU Power) provided its response to this request. As part of its response, TXU Power committed to perform a bare-metal visual inspection of all 58 bottom-mounted instrumentation penetrations, including 100 percent of the circumference of each penetration as it enters the RPV lower head, during the spring 2004 and fall 2003 refueling outages at Comanche Peak Steam Electric Station (CPSES), Units 1 and 2, respectively. For subsequent CPSES refueling outages beyond the fall 2003 and spring 2004 outages, TXU Power committed to performing a bare-metal visual examination of all 58-bottom mounted instrumentation penetrations, 100 percent of the circumference of each penetration as it enters the RPV lower head. TXU Power stated that this

inspection regime will be completed at least every third refueling outage or every five years, whichever occurs first, until CPSES and industry experience provides sound basis for a change in the inspection frequency or method. As such, TXU Power is requested to notify the NRC staff in writing of any changes to this commitment prior to implementation.

The bulletin also requested that addressees provide a summary of the RPV lower head penetration inspection that was performed at their plants, the extent of the inspection and the methods used, a description of the as-found condition of the lower head, any findings of relevant indications of through-wall leakage, and a summary of the disposition of any findings of boric acid deposits and any corrective actions taken as a result of indications found.

By letter dated December 18, 2003, TXU Power provided a summary of its inspection results at CPSES, Unit 2. TXU Power reported it had performed a 360-degree bare-metal visual examination on all 58 RPV lower head penetrations. TXU Power did not observe any evidence of RPV lower head penetration leakage.

By letter dated July 2, 2004, TXU Power provided a summary of its inspection results at CPSES, Unit 1. TXU Power reported it had performed a 360-degree bare-metal visual examination on all 58 RPV lower head penetrations. TXU Power did not observe any evidence of RPV lower head penetration leakage.

Based on its review of TXU Power's responses to NRC Bulletin 2003-02, the NRC staff finds that TXU Power has met the reporting requirements of the bulletin. Accordingly, TAC Nos. MC0530 and MC0531 are closed for CPSES, Units 1 and 2, respectively.

Sincerely,

/RA/

Mohan Thadani, Senior Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

cc: See next page

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By letter dated July 2, 2004, TXU Power provided a summary of its inspection results at CPSES, Unit 1. TXU Power reported it had performed a 360-degree bare-metal visual examination on all 58 RPV lower head penetrations. TXU Power did not observe any evidence of RPV lower head penetration leakage.

Based on its review of TXU Power's responses to NRC Bulletin 2003-02, the NRC staff finds that TXU Power has met the reporting requirements of the bulletin. Accordingly, TAC Nos. MC0561 and MC0562 are closed for CPSES, Units 1 and 2, respectively.

Sincerely,
/RA/
Mohan Thadani, Senior Project Manager, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

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